

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

<p>IN RE:</p> <p>5904 Foster Avenue Trust, Lamor Whitehead, Trustee,</p> <p style="text-align: right;">Debtor.</p>	<p>Case No.: 1-23-40211-jmm</p>
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Debtor's Affidavit Pursuant to E.D.N.Y. LBR 1007-4

I, Lamor Whitehead, Trustee of 5904 Foster Avenue Trust, swear under penalty of perjury that the following statements are true and correct to be best of my knowledge, state the following:

- i. Debtor is not a small business within the meaning of Bankruptcy Code § 101(51D);
- ii. Debtor is a single asset real estate debtor within the meaning of Bankruptcy Code § 101(51B);
- iii. Debtor owns and manages real estate located 5904 Foster Avenue, Brooklyn, New York 11234—BT Trust claims a debt of \$3,260,000.00 against Debtor that BT Trust claims was due in full on February 1, 2023, which debt disputes and is not prepared to pay in full now; further, a purported entity, Glory of God Global Ministry, Inc., which is not registered or with authority to do business in the State of New York claims a possessory interest in Debtor's located 5904 Foster Avenue, Brooklyn, New York 11234, and was able to get an order of possession on January 24, 2023, against Debtor to be restored possession to Debtor's property located 5904 Foster Avenue, Brooklyn, New York 11234, despite the fact that Glory of God Global Ministry, Inc. was not in possession of Debtor's real property at 5904 Foster Avenue, Brooklyn, New York 11234, and Glory of God Global Ministry, Inc. does not have a lease or license to be a tenant at 5904 Foster Avenue, Brooklyn, New York 11234; Debtor filed a chapter 11 voluntary petition to legally reorganize its debts;

- iv. This case was not originally commenced under chapter 7, 12, or 13, so there is no prior trustee;
- v. There is no committee organized prior to the order for relief in this chapter 11 case;
- vi. The holders of the 20 largest general unsecured claims are:

Name	Address, telephone number, e-mail	Name(s) of person(s) familiar with debtor's account	Amount of the claim	Contingent, unliquidated, disputed, or partially secured?
Glory of God Global Ministry, Inc.	15 Paerdegat 2 nd Street Brooklyn, NY 11236 (917) 807-7518 info@gloryofgodhouse.org	Joseph Williams Funmi Williams	Unknown.	Unliquidated; disputed.
Triple C's Ventures, LLC	15 Paerdegat 2 nd Street Brooklyn, NY 11236 (917) 807-7518 info@gloryofgodhouse.org	Joseph Williams Funmi Williams	Unknown.	Unliquidated; disputed.
Joseph Williams	15 Paerdegat 2 nd Street Brooklyn, NY 11236 (917) 807-7518 info@gloryofgodhouse.org	Joseph Williams	Unknown.	Unliquidated; disputed.
Funmi Williams	15 Paerdegat 2 nd Street Brooklyn, NY 11236 (917) 807-7518 info@gloryofgodhouse.org	Funmi Williams	Unknown.	Unliquidated; disputed.
BT Trust	1078 East 15 th Street Brooklyn, NY 11230 (917) 847-6877 (646) 213-0030 psol@verizon.net kulaklaw39@gmail.com	Israel Grossman Lawrence Kulak, Esq.	\$3,260,000.00	Unliquidated; disputed.
Michael Moses	1078 East 15 th Street Brooklyn, NY 11230 (646) 213-0030 kulaklaw39@gmail.com	Lawrence Kulak, Esq.	Unknown	Unliquidated; disputed.

- vii. No known secured claims.
- viii. Debtor's assets: real property located at 5904 Foster Avenue, Brooklyn, New York 11234;
Debtor's liabilities: potential debt to BT Trust in the amount of \$3,260,000.00.

- ix. Debtor holds no stock, debentures, or other securities.
- x. Glory of God Global Ministry, Inc. alleges to have been in possession of Debtor's real property located at 5904 Foster Avenue, Brooklyn, New York 11234, but Debtor disputes this and is in possession of its real property 5904 Foster Avenue, Brooklyn, New York 11234.
- xi. Debtor owns real property located at 5904 Foster Avenue, Brooklyn, New York 11234.
- xii. Debtor's assets are held at 5904 Foster Avenue, Brooklyn, New York 11234.
- xiii. Glory of God Global Ministry, Inc. v. 5904 Foster Avenue Trust; Index No. LT-329469-22/KI; Civil Court of the City of New York, County of Kings; Petitioner Glory of God Global Ministry, Inc. seeks to restore possession under RPAPL § 713(10) and for illegal lockout; on January 24, 2023, petitioner was awarded an order restoring possession of 5904 Foster Avenue, Brooklyn, New York 11234; the petition is otherwise pending.
- xiv. Debtor's senior management is Lamor Whitehead, who is trustee, and has experience as a seasoned real estate investor.
- xv. Debtor currently has no payroll or employees.
- xvi. Debtor has made no payment for services for the 30-day period following the filing of the chapter 11 petition.
- xvii. Debtor has no cash receipts and disbursements for the 30-day period following the filing of the chapter 11 petition.
- xviii. Debtor's property insurance policy covering Debtor's single real estate asset located at 5904 Foster Avenue, Brooklyn, New York 11234, is FIRST Insurance Funding, 450 Skokie Blvd., Ste. 1000, Northbrook, IL 60062-7917, phone: (800) 837-2511, fax: (800) 837-3709.

- xix. Debtor does not have any bank accounts.
- xx. Debtor has leased its real property located at 5904 Foster Avenue, Brooklyn, New York 11234, to Leaders of Tomorrow International Ministries, which operates as a church and community center. Debtor will be building a banquet hall and a kitchen on the property. Debtor will also be building residential apartments on top of the building as it is Zoned as R5 and Debtor will seek to rezone the property to R7 build higher. As a community center, the building will be open to young people for computer classes and higher education learning, and also to the elderly for exercise, game night, and health and wellness days.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed this 02/08/2023

Lamor Whitehead

Lamor Whitehead,
Trustee of 5904 Foster Avenue Trust

State of Florida

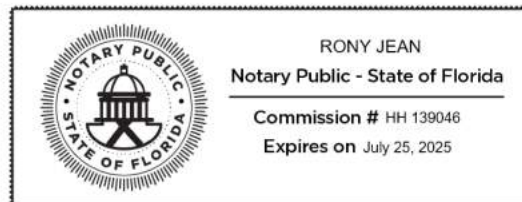
County of Broward

Before me, RONY JEAN, on this day personally appeared, **LAMOR WHITEHEAD**, trustee of 5904 Foster Avenue Trust, to be the person whose name is subscribed on the foregoing instrument and acknowledged to me that she executed the same for the purposes and consideration therein expressed. Given under my hand and seal of office this 02/08/2023.

Rony Jean

Notary Public's Signature

Printed: RONY JEAN



Notarized online using audio-video communication

My commission expires: 07/25/2025

Lamor Whitehead produced driver license as identification